

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

<b>VERNON HARRIS, JR.,</b>	)	
	)	
Plaintiff,	)	
	)	Case No.: 3:23-CV-3362
vs.	)	
	)	
<b>RHP VENTURE HOLDINGS, LLC</b>	)	
	)	
Defendant.	)	

**PLAINTIFF’S MOTION FOR ENTRY OF DEFAULT JUDGMENT AGAINST  
DEFENDANT RHP VENTURE HOLDINGS, LLC**

The Plaintiff, Vernon Harris, Jr., (“Plaintiff”), by counsel, pursuant to Fed.R.Civ.P. 55(b), respectfully moves this Court to enter a default judgment against Defendant, RHP Venture Holdings, LLC, (“Defendant Company”). This Court should grant this Motion for the reasons set forth in Plaintiff’s Brief in Support of Motion for Entry of Default Judgment filed herewith.

WHEREFORE, Plaintiff, Vernon Harris, Jr., requests that this Court enter an Order and Judgment consistent with the Plaintiff’s Brief in Support that:

1. Grants final judgment of default against Defendant, RHP Venture Holdings, LLC;
2. Awards the Plaintiff statutory damages of \$2,000.00 and punitive damages in the amount of \$20,000.00 plus any applicable interest;
3. Awards attorneys’ fees of \$14,720.00 and costs in the amount \$552.00 plus any applicable interest.

DATED this 7th day of May, 2024.

Respectfully submitted,  
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ATTORNEYS FOR PLAINTIFF

**Certificate of Service**

I hereby certify that a copy of the foregoing was filed electronically on the 7th day of May, 2024. Notice of this filing will be sent to the counsel of record for all parties by operation of the Court's electronic filing system.

By: /s/ Jayson A. Watkins

Attorney for Plaintiff